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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:	:	
	:	Civil Action No.
ALTA MESA RESOURCES, INC.,	:	
SECURITIES LITIGATION	:	4:19-CV-00957
	:	
	:	

VIDEO-RECORDED ORAL DEPOSITION OF

Expert Witness

TAYLOR J. KIRKLAND

November 15, 2023

9:14 a.m.

4550 Travis Street
Dallas, Texas 75205

Stenographically Reported by:

MAYLEEN AHMED, RMR, CRR, CRC, TX-CSR #9428

Job No.: 6306381

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1 A. Correct.

2 Q. Why didn't you review the financial data
3 at -- from AMH/AMR about the installation and
4 operation of ESPs?

5 A. I tried to. I asked for it. But the
6 data that was required for that, I don't believe we
7 could get it from the production, from -- from the
8 document production.

9 Q. And what did you do to understand that
10 the financial data, necessary to analyze whether
11 ESPs were economic at Alta Mesa, was not obtainable
12 through the production you had access to?

13 MR. SHER: Objection.

14 A. I'm sorry. Could you ask that -- are
15 you asking when I knew that? Or what was --

16 Q. What did you do to understand that the
17 financial data, necessary to analyze whether --
18 whether or not ESPs were economic at Alta Mesa, was
19 not obtainable through the productions that you had
20 access to?

21 A. I did a significant amount of searching
22 in the data production, as well requested from
23 Entwistle & Cappucci help on -- on locating that,
24 and we were unable to do so.

25 MR. PETERS: I'd like -- let's go off

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